

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	No.: 4:15-CR-00404 HEA/NAB
vs.)	
)	
OSCAR DILLON, III, and)	
MICHAEL GRADY)	
Defendants.)	

DEFENDANTS' JOINT AND UNOPPOSED
MOTION TO CONTINUE HEARING

COMES NOW, Defendants, OSCAR DILLON, III and MICHAEL GRADY, through their undersigned counsels, respectfully move this Honorable Court to reschedule the motion hearing currently set for March 29, 2018. In support thereof, the following is offered:

1. Defendants' Motions to Dismiss have been fully briefed since December 18, 2017.
2. On February 28, 2017, in lieu of an evidentiary hearing on this matter, a telephonic status hearing was held to determine the outstanding discovery issues as they related to Defendants' Motions to Dismiss. At that hearing, the government indicated it was in need of additional time to produce discovery that Defendant Dillon requested, relative to the motions to dismiss, in early December 2017.
3. The production, which included seven discs containing thousands of documents, was produced less than a week before the March 29, 2018 evidentiary hearing.

4. Based on the records the undersigned counsels have had the ability to review in such a short time span, there appears to be additional relevant documents that the government has yet to produce that are pertinent to Defendants' Motions to Dismiss.

5. For the aforementioned reasons, Defendants respectfully request that the evidentiary hearing be continued to a date to be determined at the March 29, 2018 status hearing before this Honorable Court. Additionally, Defendants request that the government be ordered to produce any and all outstanding discovery immediately upon receipt.

6. Assistant United States Attorney Michael Reilly has indicated he has no objection to both a continuance of the evidentiary hearing and re-setting the March 29, 2018 evidentiary hearing as a status hearing.

WHEREFORE, Defendants Oscar Dillon, III and Michael Grady, respectfully move this Honorable Court to continue the motion hearing and reset the March 29, 2018 evidentiary hearing as a status hearing.

Respectfully submitted,

/s/ Blaire C. Dalton
An Attorney for Oscar Dillon, III

/s/ Vadim A. Glozman
An Attorney for Oscar Dillon, III

/s/ Quinn Michaelis
Attorney for Michael Grady

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CERTIFICATE OF SERVICE

I hereby certify that on March 28, 2018, a true and correct copy of the attached **MOTION TO CONTINUE** was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following: all Attorneys of record.

/s/ Blaire C. Dalton